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Counsel to Bradley D. Sharp, Chapter 11 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re:

LESLIE KLEIN,

Debtor.

Case No.: 2:23-bk-10990-NB

Chapter 11

**NOTICE OF MOTION AND MOTION OF
CHAPTER 11 TRUSTEE FOR ORDER
AUTHORIZING (A) ABANDONMENT OF
PERSONAL PROPERTY LOCATED AT 322 N.
JUNE STREET, LOS ANGELES, CALIFORNIA
TO THE DEBTOR AND BARBARA KLEIN, AND
(B) DONATION OR DISPOSAL OF UNCLAIMED
PERSONAL PROPERTY; MEMORANDUM OF
POINTS AND AUTHORITIES; DECLARATION
OF BRADLEY D. SHARP IN SUPPORT
THEREOF**

DATE: October 7, 2025

TIME: 2:00 p.m.

PLACE: 255 East Temple Street,
Los Angeles, California

CTRM: 1545 (*or via Zoom per posted procedures*)

**TO THE HONORABLE NEIL W. BASON, UNITED STATES BANKRUPTCY JUDGE,
THE DEBTOR, BARBARA KLEIN, THE OFFICE OF THE UNITED STATES TRUSTEE,
ALL CREDITORS, AND ALL INTERESTED PARTIES:**

PLEASE TAKE NOTICE that, Bradley D. Sharp, in his capacity as Chapter 11 Trustee (the “*Trustee*”) of the bankruptcy estate of Leslie Klein, the debtor herein (the “*Debtor*”), hereby moves (the “*Motion*”) this Court for entry of an order authorizing the Trustee to (i) abandon to the Debtor and his wife Barbara Klein (“*Barbara*”) any and all personal property (the “*Personal Property*”)

1 located at 322 N. June Street, Los Angeles, California (the “*June Street Property*”) in accordance
2 with the terms and the deadline set forth below, or (ii) donate to a suitable charitable organization, or
3 dispose of, at the expense of the bankruptcy estate, any and all Personal Property located at the June
4 Street Property that is left unclaimed by the Debtor and Barbara.

5 The Personal Property located at the June Street Property is subject to (i) Barbara’s claims of
6 ownership and the Debtor’s exemption claims, both of which issues would have to be litigated,
7 perhaps through appeals, at the expense of the bankruptcy estate, and (ii) costly sale, staging, storage
8 and removal expenses, all before the Trustee could hope to obtain any value therefrom for the
9 bankruptcy estate. As the Court is aware, the Trustee now controls the June Street Property. While
10 evaluating the Personal Property, the Trustee allowed the Debtor to identify those items that he would
11 not dispute belong to the bankruptcy estate. This resulted in relatively few items that Barbara would
12 not claim as her own.¹

13 After soliciting bids from sales professionals and considering all of the aforementioned
14 circumstances, the Trustee has determined that further administration of the Personal Property at the
15 June Street Property is unduly burdensome and of inconsequential value to the bankruptcy estate.

16 The Trustee has communicated with counsel for the Debtor and Barbara regarding this issue
17 and the Trustee is informed by their counsel that, on or after October 15, 2025, the Debtor and
18 Barbara will be prepared to remove those items of the Personal Property they wish to retain.
19 Accordingly, the Trustee seeks an order allowing him to abandon any and all of the Personal Property
20 that the Debtor and Barbara wish to keep to them and that the Debtor and Barbara be required to
21 actually remove such items from the June Street Property on or before October 31, 2025 (the
22 “*Property Removal Deadline*”), at their sole expense and via suitable reasonable arrangements made
23 with the Trustee via his advisors. The Trustee further requests that the order state that upon expiration
24

25 ¹ Moreover, the Debtor claims that his wholly controlled entity, EKLK Foundation, owns the book collection in the June
26 Street Property and the Debtor’s counsel asserts that the Marital Deduction Trust of Erika Klein owns certain of the
27 Personal Property. To the extent these allegations are true, it is irrelevant to the Trustee since they are without value. As
28 those entities are controlled by the Debtor, abandonment of the items they are alleged to own will be entrusted to the
Debtor and accomplished by giving the Debtor the opportunity to remove the items described herein. (It is worth noting,
however, that the Court has previously held that the Marital Deduction Trust is a self-settled trust with any property it
owns therefore belonging to the bankruptcy estate.)

1 of the Property Removal Deadline, the Trustee may donate to a suitable charitable organization, or
2 dispose of, at the expense of the estate, any and all Personal Property then remaining at the June
3 Street Property.

4 **PLEASE TAKE FURTHER NOTICE** that, a hearing to consider the Motion has been
5 scheduled for **October 7, 2025, at 2:00 p.m. Pacific Time**, or as soon thereafter as counsel may be
6 heard before the Honorable Neil W. Bason, United States Bankruptcy Judge, in Courtroom 1545,
7 255 East Temple Street, Los Angeles, California 90012.

8 **PLEASE TAKE FURTHER NOTICE** that the Motion is based on this Notice of Motion
9 and Motion, the Memorandum of Points and Authorities, the declarations of Jeffrey W. Dulberg, and
10 Bradley D. Sharp annexed hereto, the record in this chapter 11 case, as well as any other documentary
11 evidence as may be presented to this Court at or before the hearing.

12 **PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Bankruptcy Rule 9013-1(f),
13 if you wish to oppose the Motion, you must file a written response with the Court and serve a copy
14 of it upon the undersigned counsel no later than fourteen (14) days prior to the hearing on the Motion.
15 The failure to properly file and serve an opposition may be deemed consent to the relief requested in
16 the Motion or a waiver of any right to oppose the Motion.

17 **WHEREFORE**, the Trustee respectfully requests that this Court enter an order (a) granting
18 the Motion; and (b) granting the Trustee such other and further relief as the Court deems just and
19 proper.

20 Dated: September 8, 2025

PACHULSKI STANG ZIEHL & JONES LLP

21 By /s/ Jeffrey W. Dulberg
22 Jeffrey W. Dulberg

23 Counsel for Bradley D. Sharp, Chapter 11
24 Trustee

MEMORANDUM OF POINTS AND AUTHORITIES

I.
PRELIMINARY STATEMENT

The Trustee seeks entry of an order authorizing the Trustee to either abandon to the Debtor and his wife Barbara Klein (“*Barbara*”), donate to a suitable charitable organization, or dispose of, at the expense of the bankruptcy estate, any and all personal property (the “*Personal Property*”) located at 322 N. June Street, Los Angeles, California (the “*June Street Property*”). The Trustee is focused upon readying the June Street Property for sale.

The Personal Property located at the June Street Property is subject to (i) Barbara’s claims of ownership and the Debtor’s exemption claims, both of which issues would have to be litigated, perhaps through appeals, at the expense of the bankruptcy estate, and (ii) costly sale, staging, storage and removal expenses, all before the Trustee could hope to obtain any value therefrom for the bankruptcy estate. As the Court is aware, the Trustee now controls the June Street Property. While evaluating the Personal Property, the Trustee allowed the Debtor to identify those items that he would not dispute belong to the bankruptcy estate. This resulted in relatively few items that Barbara would not claim as her own.²

After soliciting bids from sales professionals and considering all of the aforementioned circumstances, the Trustee has determined that further administration of the Personal Property at the June Street Property is unduly burdensome and of inconsequential value to the bankruptcy estate.

The Trustee has communicated with counsel for the Debtor and Barbara regarding this issue and the Trustee is informed by their counsel that, on or after October 15, 2025, the Debtor and Barbara will be prepared to remove those items of the Personal Property they wish to retain. Accordingly, the Trustee seeks an order allowing him to abandon any and all of the Personal Property

² Moreover, the Debtor claims that his wholly controlled entity, EKLK Foundation, owns the book collection in the June Street Property and the Debtor’s counsel asserts that the Marital Deduction Trust of Erika Klein owns certain of the Personal Property. To the extent these allegations are true, it is irrelevant to the Trustee since they are without value. As those entities are controlled by the Debtor, abandonment of the items they are alleged to own will be entrusted to the Debtor and accomplished by giving the Debtor the opportunity to remove the items described herein. (It is worth noting, however, that the Court has previously held that the Marital Deduction Trust is a self-settled trust with any property it owns therefore belonging to the bankruptcy estate.)

1 that the Debtor and Barbara wish to keep to them and that the Debtor and Barbara be required to
2 actually remove such items from the June Street Property on or before October 31, 2025 (the
3 “***Property Removal Deadline***”), at their sole expense and via suitable reasonable arrangements made
4 with the Trustee via his advisors, including that any professionals used by the Debtor or Barbara (e.g.
5 moving company) must maintain appropriate insurance coverage and provide a certificate of
6 insurance to the Trustee prior to being permitted to enter the June Street Property. The Trustee further
7 requests that the order state that upon expiration of the Property Removal Deadline, the Trustee may
8 donate to a suitable charitable organization, or dispose of, at the expense of the estate, any and all
9 Personal Property then remaining at the June Street Property.

10 **II.**
11 **JURISDICTION AND VENUE**

12 The Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is
13 a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue for proceedings on this Motion is proper
14 in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

15 **III.**
16 **STATEMENT OF FACTS**

17 **A. General Case Background**

18 On February 22, 2023, the Debtor commenced a voluntary chapter 11 case in the United
19 States Bankruptcy Court for the Central District of California (Los Angeles Division) Case No.
20 23-10990.

21 On May 23, 2023, and in response to certain creditors seeking to dismiss the Debtor’s case,
22 the Court denied the motion to dismiss and instead instructed the Office of the United States Trustee
23 (the “***UST***”) to appoint a chapter 11 trustee to administer the Debtor’s Estate and chapter 11 case. In
24 response, the UST filed a *Notice of Appointment of Chapter 11 Trustee [Docket No. 151]*. On May
25 24, 2023, the UST filed an *Application for Order Approving Appointment of Trustee and Fixing Bond*
26 *[Docket No. 154]*, which was approved by order entered the same day *[Docket No. 155]*. On that
27 same day, the Trustee accepted his appointment *[Docket No. 156]*, as the chapter 11 trustee of the
28 Estate.

1 **B. Administration of the June Street Property**

2 The Trustee filed a complaint styled as *Sharp v. Leslie Klein*, et al., Adv. Case No. 24-01140,
3 seeking to quiet title on, and obtain full value from, the June Street Property and to avoid any
4 unrecorded transfers or other interests by virtue of section 544(a)(3) of the Bankruptcy Code.

5 The Defendants, including the Debtor and Barbara (collectively, the “**Defendants**”),
6 contended that the June Street Property is owned by the “Marital Deduction Trust,” which was
7 purportedly established by the Debtor and his late spouse (Erika Klein) at the time of her death; and
8 that Barbara holds a life-estate in the June Street Property.

9 On December 18, 2024, Judge Sandra Klein ruled from the bench and granted summary
10 judgment on all counts in the Trustee’s complaint. The Court entered an order on December 20, 2024,
11 formally granting the summary judgment motion in favor of the Trustee and against the Defendants.
12 The Court found that the June Street Property is property of the estate (and that the Debtor’s living
13 trust is “self-settled” and the property therein is in fact property of the estate) and that all of the
14 unrecorded interests or transfers were avoided. [Adv. Docket No. 62] (the “**Summary Judgment**
15 **Order**”).

16 On January 3, 2025, the Defendants appealed the Summary Judgment Order [Lead Case No.
17 23-10990, Docket No. 67] to the Bankruptcy Appellate Panel (“**BAP**”) (BAP Case No. 25-1002). On
18 May 29, 2025, the BAP heard oral argument and on June 5, 2025, issued a memorandum decision
19 [BAP Docket No. 20] affirming the Summary Judgment Order in all respects. On June 18, 2025,
20 Defendants filed a Petition for Panel Rehearing [BAP Docket No. 24], which was denied by the BAP
21 on August 6, 2025 [BAP Docket No. 25].

22 On January 17, 2025, the Trustee filed a motion for turnover of the June Street Property (the
23 “**Turnover Motion**”), which was heard on February 12, 2025, and approved by order entered on
24 February 13, 2025 (the “**Turnover Order**”). In deciding the Turnover Motion, the Court found that
25 the Trustee holds the power to exercise or enforce all legal and equitable rights relating to the June
26 Street Property. Under the terms of the Turnover Order, the Debtor and all occupants of the Property
27 were to have vacated and delivered possession of the June Street Property to the Trustee no later than
28

thirty (30) following entry of the Turnover Order, *i.e.*, March 17, 2025. The Debtor failed to honor the terms of the Turnover Order.

On February 26, 2025, the Debtor and the Defendants appealed the Turnover Order [Docket No. 939] to the Bankruptcy Appellate Panel (BAP Case No. 25-1037). On June 12, 2025, the BAP heard oral argument and on June 18, 2025, issued a memorandum decision [BAP Docket No. 21] affirming the Turnover Order in all respects.

On March 18, 2025, the Trustee filed a motion to enforce the turnover of the June Street Property to the Trustee (the “**Turnover Enforcement Motion**”) [Docket No. 962]. The Turnover Enforcement Motion sought, (a) to compel the Debtor and all occupants to vacate the June Street Property, (b) to direct and authorize the United States Marshals Service, or any other law enforcement agency with jurisdiction, to enforce the Turnover Order to restore control and possession of the June Street Property to the Estate and the Trustee, and (c) to authorize the Trustee to remove any personal property left at the June Street Property and to place such personal property in a storage unit that would then be made available to Debtor.

On April 10, 2025, the Court granted the Turnover Enforcement Motion. [Docket No. 1015] (the “**Enforcement Order**”). Pursuant to the Enforcement Order, the United States Marshals Service provided notice to the Debtor that he must surrender possession of the June Street Property on or before May 4, 2025, or he and any others will be removed. On May 6, 2025, the Trustee’s representatives and the United States Marshals Service were able to gain entry to the June Street Property because the Debtor relinquished occupancy. The Trustee has been in possession of the June Street Property since that time.

On July 2, 2025, Jeffrey W. Dulberg, counsel for the Trustee, sent correspondence to Eric Olson, Debtor’s attorney, advising that the Trustee would be liquidating the personal property left behind at the June Street Property, but before doing so, would provide the Debtor with the opportunity to remove certain items to the extent the Debtor holds a valid and enforceable exemption. In his letter, Mr. Dulberg further advised that if those items were not removed by August 14, 2025, the Personal Property would be sold, donated or abandoned as necessary. See letter dated July 2, 2025, attached hereto as **Exhibit A**. After being provided with numerous opportunities by the Trustee

1 within which to visit the June Street Property to identify and remove certain items, the Debtor and
2 Barbara ultimately identified the majority of the Personal Property as Barbara's sole and separate
3 property. In addition, the Debtor holds and asserted exemptions in certain of the Personal Property
4 which the Trustee would have difficulty overcoming and which reduce the value of these assets to
5 the estate.

6 Thus, the Personal Property located at the June Street Property is ultimately subject to (i)
7 Barbara's claims of ownership and the Debtor's exemption claims, both of which issues would have
8 to be litigated, through appeals, at the expense of the bankruptcy estate, and (ii) costly sale, staging,
9 storage and removal expenses, all before the Trustee could hope to obtain any value therefrom for
10 the bankruptcy estate. While evaluating the Personal Property, the Trustee allowed the Debtor to
11 identify those items that he would not dispute belong to the bankruptcy estate. This resulted in
12 relatively few items that Barbara would not claim as her own.³ After soliciting bids from sales
13 professionals and considering all of the aforementioned circumstances, the Trustee has determined
14 that further administration of the Personal Property at the June Street Property is unduly burdensome
15 and of inconsequential value to the bankruptcy estate.

16 **IV.**
17 **ARGUMENT**

18 Section 554(a) of the Bankruptcy Code provides that, "[a]fter notice and a hearing, the trustee
19 may abandon any property of the estate that is burdensome to the estate or that is of inconsequential
20 value and benefit to the estate." 11 U.S.C. § 554(a); *see, e.g., Midlantic Nat'l Bank v. N.J. Dep't of*
21 *Env'tl. Prot.*, 474 U.S. 494, 497 (1986), *reh'g denied*, 475 U.S. 1091 (1986). In evaluating decisions
22 to abandon property of the estate, courts focus on whether such decision reflects a business judgment
23 made in good faith. *See, e.g., In re Cult Awareness Network, Inc.*, 205 B.R. 575, 579 (Bankr. N.D.
24 Ill. 1997) (citations omitted); *In re Wilson*, 94 B.R. 886, 888-889 (Bankr. E.D. Va. 1989); *In re*
25 *Moore*, 110 B.R. 924, 928 (Bankr. C.D. Cal. 1990) ("The choice of which type of action [is

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28 ³ See footnote 2, *supra*.

1 appropriate to liquidate the assets of the estate] belongs to the trustee within the sound exercise of
2 the trustee's business judgment so long as the trustee fulfills his statutory duties.”).

3 The Trustee has determined that further administration of the Personal Property at the June
4 Street Property is not in the best interest of the estate. The Personal Property is unduly burdensome
5 and of inconsequential value to the bankruptcy estate. The Personal Property located at the June
6 Street Property is subject to (i) Barbara’s claims of ownership and the Debtor’s exemption claims,
7 both of which issues would have to be litigated, through appeals, at the expense of the bankruptcy
8 estate, and (ii) costly sale, staging, storage and removal expenses, all before the Trustee could hope
9 to obtain any value therefrom for the bankruptcy estate. There are relatively few items that Barbara
10 would not claim as her own which means that the Trustee would have to overcome Barbara’s claims
11 of ownership for much of the Personal Property. This naturally mitigates against the value of these
12 assets for the estate. After soliciting bids from sales professionals and considering all of the
13 aforementioned circumstances, the Trustee has determined that further administration of the Personal
14 Property at the June Street Property would be unduly burdensome, and the property is of
15 inconsequential value to the bankruptcy estate.

16 The Trustee, therefore, submits that the standard set forth in section 554(a) of the Bankruptcy
17 Code is satisfied. Attached hereto as **Exhibit “B”** is a draft proposed order granting this Motion.

18 **V.**
19 **CONCLUSION**

20 For the reasons set forth herein, the Trustee respectfully requests that the Court enter an order
21 authorizing the Trustee to (i) abandon to the Debtor and his wife Barbara any and all Personal
22 Property located at the June Street Property in accordance with the terms and the deadline set forth
23 hereinabove, or (ii) donate to a suitable charitable organization, or dispose of, at the expense of the
24 bankruptcy estate, any and all Personal Property located at the June Street Property that is left
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1 unclaimed by the Debtor and Barbara. and (c) granting such other and further relief as it deems
2 necessary and appropriate.

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4 Dated: September 8, 2025

PACHULSKI STANG ZIEHL & JONES LLP

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6 By /s/ Jeffrey W. Dulberg
Jeffrey W. Dulberg

7 Counsel for Bradley D. Sharp, Chapter 11
8 Trustee
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PACHULSKI STANG ZIEHL & JONES LLP
ATTORNEYS AT LAW
LOS ANGELES, CALIFORNIA

DECLARATION OF BRADLEY D. SHARP

I, Bradley D. Sharp, declare as follows:

1. I am the duly appointed, authorized and acting chapter 11 trustee in the above-captioned bankruptcy case of Leslie Klein. If called upon to testify, I would testify to the facts set forth in this Declaration.

2. I make this Declaration in support of the Motion of Chapter 11 Trustee for Order Authorizing (A) Abandonment of Personal Property Located at 322 N. June Street, Los Angeles, California to the Debtor and Barbara Klein, and (B) Donation or Disposal of Unclaimed Personal Property (the “*Motion*”).⁴

3. I filed a complaint styled as *Sharp v. Leslie Klein*, et al., Adv. Case No. 24-01140, seeking to quiet title on, and obtain full value from, the June Street Property and to avoid any unrecorded transfers or other interests by virtue of section 544(a)(3) of the Bankruptcy Code.

4. The Defendants, including the Debtor and Barbara contended that the June Street Property is owned by the “Marital Deduction Trust,” which was purportedly established by the Debtor and his late spouse (Erika Klein) at the time of her death; and that Barbara holds a life-estate in the June Street Property.

5. On December 18, 2024, Judge Sandra Klein ruled from the bench and granted summary judgment on all counts in my complaint. The Court entered an order on December 20, 2024, formally granting the summary judgment motion in my favor and against the Defendants. The Court found that the June Street Property is property of the estate (and that the Debtor’s living trust is “self-settled” and the property therein is in fact property of the estate) and that all of the unrecorded interests or transfers were avoided. [Adv. Docket No. 62].

6. On January 3, 2025, the Defendants appealed the Summary Judgment Order [Lead Case No. 23-10990, Docket No. 67] to the Bankruptcy Appellate Panel (BAP Case No. 25-1002). On May 29, 2025, the BAP heard oral argument and on June 5, 2025, issued a memorandum decision [BAP Docket No. 20] affirming the Summary Judgment Order in all respects. On June 18, 2025,

⁴ Capitalized terms not defined herein shall have the same meaning ascribed to them in the Motion.

1 Defendants filed a Petition for Panel Rehearing [BAP Docket No. 24], which was denied by the BAP
2 on August 6, 2025 [BAP Docket No. 25].

3 7. On January 17, 2025, I filed a motion for turnover of the June Street Property, which
4 was heard on February 12, 2025, and approved by order entered on February 13, 2025. In deciding
5 the Turnover Motion, the Court found that I hold the power to exercise or enforce all legal and
6 equitable rights relating to the June Street Property, including all authority to perform all acts as its
7 owner. Under the terms of the Turnover Order, the Debtor and all occupants of the Property were to
8 have vacated and delivered possession of the June Street Property to the Trustee no later than thirty
9 (30) following entry of the June Street Turnover Order, *i.e.*, March 17, 2025. The Debtor failed to
10 honor the terms of the June Street Turnover Order.

11 8. On February 26, 2025, the Debtor and the Defendants appealed the Turnover Order
12 [Docket No. 939] to the Bankruptcy Appellate Panel (BAP Case No. 25-1037). On June 12, 2025,
13 the BAP heard oral argument and on June 18, 2025, issued a memorandum decision [BAP Docket
14 No. 21] affirming the June Street Turnover Order in all respects.

15 9. On March 18, 2025, I filed a motion to enforce the turnover of the June Street Property
16 to the Trustee [Docket No. 962]. The Turnover Enforcement Motion sought, (a) to compel the Debtor
17 and all occupants to vacate the June Street Property, (b) to direct and authorize the United States
18 Marshals Service, or any other law enforcement agency with jurisdiction, to enforce the Turnover
19 Order to restore control and possession of the June Street Property to the Estate and myself, and (c)
20 to authorize me to remove any personal property left at the June Street Property and to place such
21 personal property in a storage unit that would then be made available to Debtor.

22 10. On April 10, 2025, the Court granted the Turnover Enforcement Motion. [Docket No.
23 1015]. Pursuant to the Enforcement Order, the United States Marshals Service provided notice to the
24 Debtor that he must surrender possession of the June Street Property on or before May 4, 2025, or he
25 and any others will be removed. On May 6, 2025, my representatives and the United States Marshals
26 Service were able to gain entry to the June Street Property because the Debtor relinquished
27 occupancy. I have been in possession of the June Street Property since that time.

1 11. On July 2, 2025, my counsel sent correspondence to Eric Olson, the Debtor's attorney,
2 advising that I would be liquidating the personal property left behind at the June Street Property, but
3 before doing so, would provide the Debtor with the opportunity to remove certain items to the extent
4 the Debtor holds a valid and enforceable exemption. In his letter, Mr. Dulberg further advised that
5 if those items were not removed by August 14, 2025, the Personal Property would be sold, donated
6 or abandoned as necessary. See letter dated July 2, 2025, attached hereto as Exhibit A. After being
7 provided with numerous opportunities by the Trustee within which to visit the June Street Property
8 to identify and remove certain items, the Debtor and Barbara ultimately identified the majority of the
9 Personal Property as Barbara's sole and separate property.

10 12. The Personal Property located at the June Street Property is subject to (i) Barbara's
11 claims of ownership and the Debtor's exemption claims, both of which issues would have to be
12 litigated, through appeals, at the expense of the bankruptcy estate, and (ii) costly sale, staging, storage
13 and removal expenses, all before I could hope to obtain any value therefrom for the bankruptcy estate.
14 While evaluating the Personal Property, I allowed the Debtor to identify those items that he would
15 not dispute belong to the bankruptcy estate. This resulted in relatively few items that Barbara would
16 not claim as her own. After soliciting bids from sales professionals and considering all of the
17 aforementioned circumstances, I have determined that further administration of the Personal Property
18 at the June Street Property would be unduly burdensome and therefore the assets are of
19 inconsequential value to the bankruptcy estate. Therefore, in my business judgment, I believe that
20 abandoning, donating, or disposing of the Personal Property would be in the best interest of the
21 Estate.

22 13. Through my counsel, I have communicated with counsel for the Debtor and Barbara
23 regarding this issue and I am informed by their counsel that, on or after October 15, 2025, the Debtor
24 and Barbara will be prepared to remove those items of the Personal Property they wish to retain.
25 Accordingly, I seek an order allowing me to abandon any and all of the Personal Property that the
26 Debtor and Barbara wish to keep to them and that the Debtor and Barbara be required to actually
27 remove such items from the June Street Property on or before October 31, 2025, at their sole expense
28 and via suitable reasonable arrangements made with my advisors, including that any professionals

1 used by the Debtor or Barbara (e.g. moving company) must maintain appropriate insurance coverage
2 and provide a certificate of insurance to me or my advisors prior to being permitted to enter the June
3 Street Property.

4 14. I further request that the order state that upon expiration of the Property Removal
5 Deadline, I may donate to a suitable charitable organization, or dispose of, at the expense of the
6 estate, any and all Personal Property then remaining at the June Street Property.

7 I declare under penalty of perjury under the laws of the United States of America that the
8 foregoing is true and correct.

9 Executed this 2nd day of September, 2025, at San Juan Capistrano, California.

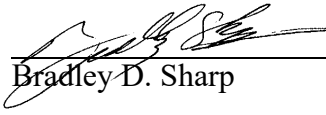
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13 Bradley D. Sharp
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EXHIBIT A

From: Jeffrey Dulberg
Sent: Wednesday, July 2, 2025 2:24 PM
To: eric@ejolsonlaw.com
Cc: 'Leslie Klein' <les.kleinlaw@gmail.com>; leskleinlaw@gmail.com
Subject: Klein - Personal Property at 322 N. June St.

Mr. Olson – Please see the attached letter of even date.

Best,

Jeffrey Dulberg
Pachulski Stang Ziehl & Jones LLP
Tel: 310.277.6910 | Fax: 310.201.0760
jdulberg@pszilaw.com
[vCard](#) | [Bio](#) | [LinkedIn](#)



Los Angeles | New York | Wilmington, DE | Houston | San Francisco



Jeffrey W. Dulberg

July 2, 2025

310.772.2355
jdulberg@pszjlaw.com

LOS ANGELES

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713.691.9385

SAN FRANCISCO

ONE SANSOME STREET, 34TH FL. STE. 3430
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415.263.7000

Via E-mail: Eric@EJOlsonLaw.com

Eric J. Olson, Esq.
EJOLSONLAW
301 East Colorado Boulevard
Suite 520
Pasadena, California 91101

Re: In re Leslie Klein, Case No. 2:23-bk-10990-SK**Dear Mr. Olson:**

Pursuant to his duties under section 1106 of the Bankruptcy Code, the Trustee plans to liquidate the personal property (as described below, the “**Personal Property**”) located at 322 N. June St., Los Angeles, CA (the “**June St. Property**”) as property owned by the Leslie Klein bankruptcy estate. However, before the Trustee conducts an auction or otherwise disposes of the Personal Property, he will provide Mr. Klein with an opportunity to remove certain items of the Personal Property to the extent he holds a valid and enforceable exemption under section 522 of the Bankruptcy Code and applicable California law.

Subject to the conditions and exceptions set forth below, the Trustee will provide Mr. Klein a designated day (to be determined) to identify the Personal Property that he wishes to retain, and a designated day to physically remove the designated Personal Property from the June St. Property (likely August 14, 2025) at Mr. Klein’s sole expense.

If any of the Personal Property first identified by Mr. Klein is not removed by August 14, 2025, such Personal Property will be sold, donated or otherwise discarded as set forth below.



July 2, 2025
Page 2

**Property Subject to Exemption Which Mr. Klein MUST
Remove OR Abandon His Claim**

Description Exempt Amount

TV's, Phones, computers (" <u>Electronics</u> ")	\$3,000
Sports and Hobby Equipment	\$2,000
Clothes and Shoes	\$2,000

The Trustee is granting Mr. Klein permission to remove and keep all Electronics, Sports and Hobby Equipment, Clothes and Shoes. All other Personal Property may not be removed by Mr. Klein, or any other party related to him.

For the categories listed above, Mr. Klein may remove and keep any items that he wishes, however, to the extent he elects to leave behind any items in these categories, as of August 15, 2025, **he will be deemed to have abandoned his interest in the items in these categories.** In those cases, the Trustee will then sell the remaining items in these categories and **not** turn over the proceeds to Mr. Klein.

**Property Subject to Exemption Which Mr. Klein May NOT
Remove**

- Books or Art Objects: No Exemption Claimed by Mr. Klein
- Household Furnishings: Exempt Amount - \$8,000
- Furs and Jewelry: Exempt Amount - \$9,525

No Books or Art Objects will be allowed to be removed as Mr. Klein claimed a zero exemption in this category.

No couches, coffee tables, dining room tables with chairs, mattresses with bedframes, wall mirrors, desk with chairs, lamps, rugs, dressers, kitchen table, patio furniture, cabinets, refrigerators, and other household items (collectively, "**Household Furnishings**") may be removed. The Trustee will sell all Household Furnishings and Mr. Klein will be entitled to the first \$8,000 in net sale proceeds, after costs of sale (including but not limited to sale/auctioneer fees, expenses, taxes, etc.).

The Trustee is not in possession of the furs, diamond ring, gold necklace, diamond earrings, gold rings and costume jewelry (collectively, "**Furs and Jewelry**") referenced in Mr. Klein's



PACHULSKI
STANG
ZIEHL &
JONES

July 2, 2025
Page 3

bankruptcy schedules. Pursuant to section 542 of the Bankruptcy Code, Mr. Klein is obligated to account to the Trustee for the Furs and Jewelry. In the event he does so, the Trustee will sell all Furs and Jewelry and Mr. Klein will be entitled to the first \$9,525 in net sale proceeds, after costs of sale (including but not limited to sale/auctioneer fees, expenses, taxes, etc.).

The Trustee will file a motion with the Court seeking authority to sell the Personal Property subject to the exemptions and procedures described herein. We believe that it would be productive to engage in a discussion regarding the Personal Property and the exemptions before filing the motion so that the Trustee can attempt to align the motion with any resolutions or disagreements between them.

Please review and let me know when we can discuss.

Thank you

Very truly yours,

A handwritten signature in black ink, appearing to read 'Jeffrey W. Dulberg'.

Jeffrey W. Dulberg

JWD:mrsv

EXHIBIT B

Jeffrey W. Dulberg (State Bar No. 181200)
John W. Lucas (State Bar No. 271038)
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Counsel to Bradley D. Sharp, Chapter 11 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re:

LESLIE KLEIN,

Debtor.

Case No.: 2:23-bk-10990-NB

Chapter 11

**ORDER APPROVING MOTION AUTHORIZING
(A) ABANDONMENT OF PERSONAL
PROPERTY LOCATED AT 322 N. JUNE
STREET, LOS ANGELES, CALIFORNIA TO
THE DEBTOR AND BARBARA KLEIN, AND
(B) DONATION OR DISPOSAL OF UNCLAIMED
PERSONAL PROPERTY**

DATE: October 7, 2025

TIME: 2:00 p.m.

PLACE: 255 East Temple Street,
Los Angeles, California

CTRM: 1545 (*or via Zoom per posted procedures*)

The Court has considered the Motion for Order Authorizing (A) Abandonment of Personal Property Located at 322 N. June Street, Los Angeles, California to the Debtor and Barbara Klein, and (B) Donation or Disposal of Unclaimed Personal Property (the “*Motion*”)¹ [Docket No. ____].

¹ Capitalized terms not defined herein shall have the same meaning ascribed to them in the Motion.

1 Based upon the Court's review of the Motion and the Declaration of Bradley D. Sharp in
2 support of the Motion, the Court finds that (1) the relief requested in the Motion is reasonable,
3 appropriate, and in the best interests of the estate (the "*Estate*"); and (2) notice of the Motion was
4 adequate and appropriate under the circumstances and no further notice be given, and therefore

5 **IT IS HEREBY ORDERED:**

6 1. The Personal Property located at the June Street Property is abandoned pursuant to 11
7 U.S.C. § 554(a).

8 2. The Debtor and Barbara Klein ("*Barbara*"), at their sole expense, must remove items
9 of Personal Property that they wish to retain from the June Street Property on or before October 31,
10 2025 (the "*Property Removal Deadline*").

11 3. Any professionals used by the Debtor or Barbara (e.g. moving company) must
12 maintain appropriate insurance coverage and provide a certificate of insurance to the Trustee prior to
13 being permitted to enter the June Street Property.

14 4. Upon expiration of the Property Removal Deadline, the Trustee is authorized to
15 donate to a suitable charitable organization, or dispose of, at the expense of the Estate, any and all
16 Personal Property then remaining at the June Street Property.

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
10100 Santa Monica Boulevard, 13th Floor, Los Angeles, California 90067

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF MOTION AND MOTION OF CHAPTER 11 TRUSTEE FOR ORDER AUTHORIZING (A) ABANDONMENT OF PERSONAL PROPERTY LOCATED AT 322 N. JUNE STREET, LOS ANGELES, CALIFORNIA TO THE DEBTOR AND BARBARA KLEIN, AND (B) DONATION OR DISPOSAL OF UNCLAIMED PERSONAL PROPERTY; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF BRADLEY D. SHARP IN SUPPORT THEREOF** served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **September 8, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**: On (*date*) **September 8, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **September 8, 2025**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Via Email:

Eric J Olson: eric@ejolsonlaw.com

Leslie Klein: les.kleinlaw@gmail.com;
leskleinlaw@gmail.com; kleinlaw@earthlink.net

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

September 8, 2025
Date

Nancy H. Brown
Printed Name

/s/ Nancy H. Brown
Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Case 2:23-bk-10990-SK

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CDCA Case No. 2:23-10990-NB

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Clarisse Young Shumaker
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c/o Chora Young & Manasser
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Brooklyn, NY 11219

Gestetner Charitable Remainder Unitrust
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s/b/m/t Chase Bank USA, N.A.
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